

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In The Matter Of:	)	
	)	Case Number 16-46379-659
Shawn M. Gilligan	)	
Jan M Gilligan	)	
	)	Chapter 13
Debtors,	)	
	)	Objection to Confirmation filed by Bank
Bank of America, N.A.	)	of America, N.A.
	)	
Creditor,	)	
	)	

**OBJECTION TO CONFIRMATION**

Comes now Bank of America, N.A. by its attorney and for its objection to confirmation states as follows:

1. Bank of America, N.A. is the holder of a Deed of Trust and Note secured by real property located at 6381 Lansdowne Ave, Saint Louis, MO 63109-2218. Said property is listed by the Debtors as an asset of the bankruptcy estate.

2. The approximate prepetition arrearages owed to Bank of America, N.A. are \$12,740.51. The approximate total pay off due to Bank of America, N.A. under the note is \$132,013.04.

3. The Debtor's plan lists arrearages as \$3,000. The current pre-petition arrearage owed is \$12,740.51.



WHEREFORE, Bank of America, N.A. prays confirmation of the plan filed by the Debtors be denied, that this case be dismissed for failure to propose a confirmable plan; and for such further orders as the Court deems just and proper.

Dated October 20, 2016

Respectfully Submitted,  
Millsap & Singer, LLC

/s/ William T. Holmes, II

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## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on October 20, 2016, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic filing as issued by the Court or in the alternative has been served by depositing a true and correct copy of same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service within the state of Missouri on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court.

/s/ William T. Holmes, II

### **Electronic Mail Notice List**

The following is the list of attorneys who are currently on the list to receive e-mail notices for this case.

Sean C. Paul

John V. LaBarge, Jr.

Office of the United States Trustee

### **Manual Notice List**

The following is a list of parties who are not on the list to receive e-mail notices for this case (who therefore require manual noticing).

Shawn M. Gilligan  
Jan M Gilligan  
6381 Lansdowne Ave.  
Saint Louis, MO 63109

